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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

**Petition of Southeast Telephone, Inc., for)
Arbitration of Certain Terms and)
Conditions of the Proposed Agreement with)
Kentucky ALLTEL, Inc., Pursuant to the)
Communications Act of 1934, as amended)
by the Telecommunications Act of 1996)**

Docket No. 2003-00115

**JOINT MOTION FOR LEAVE TO FILE
OUTSIDE TIME ALLOTTED FOR ARBITRATION BRIEFS**


Comes now Southeast Telephone Company ("SouthEast") and Kentucky ALLTEL, Inc. ("ALLTEL") and for their Joint Motion for Leave to File Outside the Time Allotted for Arbitration Briefs, state as follows:

1. By Order dated December 19, 2003, (the Arbitration Order) the Commission directed the parties to file an interconnection agreement consistent with the Arbitration Order.
2. Without waiving any rights to appeal and under protest, ALLTEL provided SouthEast an interconnection agreement, which it believes is consistent with the Arbitration Order and the parties have participated in several telephone conferences with respect to the Agreement and have resolved language on all except one issue.
3. The parties had originally disputed two separate issues, the first regarding whether vertical features would be charged in addition to the port charge, and the second regarding whether ALLTEL is required to unbundle local circuit switching for SouthEast when SouthEast serves an end-user with four (4) or more voice-grade (DS0) equivalents or lines. The parties have since resolved the first issue, leaving only the second issue in dispute.
4. As the order does not address this issue, the parties do not anticipate being able to resolve language with respect to that issue without further legal and perhaps factual determinations by the Commission.
5. On Tuesday, January 20, 2004, the parties filed a Joint Motion for Continuance of the deadline to file an interconnection agreement so that briefs could be filed on the sole remaining issue by Friday, January 23, 2004.

6. The parties hereby request that the deadline to file the agreement be further suspended and that the parties be allowed leave by this Commission to file on Monday, January 26, 2004, a description of the issue and the parties' respective legal arguments with respect to that issue. The parties propose to file the agreement within two days following resolution of this issue.
7. ALLTEL expressly reserves and does not waive any rights to further proceedings as may be necessary with respect to any factual determinations that may be occasioned by or necessary to resolve the issues to be presented in the January 26, 2004, filings by the parties.
8. Mr. Stephen B. Rowell, Senior Vice President, State Government Affairs for ALLTEL has authorized the undersigned to represent that SouthEast joins in this motion.

Wherefore the parties move for leave to file their post-arbitration briefs outside the time originally allotted by the parties and the Commission, and further renew their motion for continuance of the deadline for filing of the interconnection agreement to allow the parties to file their description and statements of legal positions on the unresolved issue by Monday, January 26, 2004, and to then file the interconnection agreement within two days following the determination.

Respectfully submitted,



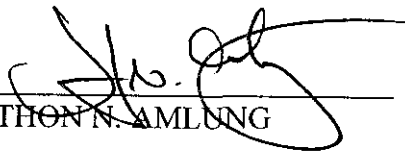
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion for Leave to File Outside of Allotted Time was served upon Kentucky ALLTEL, Inc., by mailing a copy of same to:

James H. Newberry, Jr., Esq.
Noelle M. Holiday, Esq.
Wyatt, Tarrant & Combs, LLP
250 West Main Street, Suite 1600
Lexington, KY 40507
(859) 233-2012

This the 26th day of January, 2004.



JONATHON N. AMLUNG